Jeffrey Pope, WY S.B. No. 7-4859 Bryson C. Smith, WY S.B. No. 7-6199 HOLLAND & HART LLP 645 South Cache Street, Suite 100 P.O. Box 68

Jackson, WY 83001-0068 Telephone: (307) 734-9741 Facsimile: (307) 739-9744 jspope@hollandhart.com bcsmith@hollandhart.com

Greg Goldberg Christopher Jackson HOLLAND & HART LLP 557 17th Street, Suite 3200 Denver, CO 80202

Telephone: (303) 295 - 8099 Facsimile: (303) 668 - 7524 ggoldberg@hollandhart.com cmjcakson@hollandhart.com W. Gordon Dobie (*Pro Hac Vice*)
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60601-9703
Telephone: (312) 558-5600

Facsimile: (312) 558-5700 wdobie@winston.com

Jeanifer E. Parsigian (*Pro Hac Vice*) WINSTON & STRAWN LLP 101 California Street San Francisco, CA 94111 Telephone: (415) 591-1469 Facsimile: (415) 591-1000 jparsigian@winston.com

Attorneys for Defendants Nicholas Piazza, SP Capital Management, LLC, Oleksandr Yaremenko, TNA Corporate Solutions, LLC, and Oleg Bakhmatyuk

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

Gramercy Distressed Opportunity Fund II, L.P., Gramercy Distressed Opportunity Fund III, L.P., Gramercy Distressed Opportunity Fund III-A, L.P., Gramercy Funds Management LLC, Gramercy EM Credit Total Return Fund, and Roehampton Partners LLC,

Plaintiffs,

VS.

Nicholas Piazza, SP Capital Management, LLC, Oleksandr Yaremenko, and TNA Corporate Solutions, LLC, and Oleg Bakhmatyuk

Defendants.

Civil Action No. 0:21-cv-00223-NDF

Judge: Hon. Kelly Rankin

STIPULATED MOTION OF VOLUNTARY DISMISSAL WITH PREJDUICE

WHEREAS, the parties in the above-captioned actions, through their counsel, stipulate to the following and respectfully request this Court's approval of their Stipulation of Dismissal with prejudice:

- 1. This Stipulation of Dismissal with prejudice is made and entered between Plaintiffs Gramercy Distressed Opportunity Fund II, L.P., Gramercy Distressed Opportunity Fund III, L.P., Gramercy Distressed Opportunity Fund III-A, L.P., Gramercy Funds Management LLC, Gramercy EM Credit Total Return Fund, and Roehampton Partners LLC, and Defendants Nicholas Piazza, SP Capital Management, LLC, Oleksandr Yaremenko, TNA Corporate Solutions, LLC, and Oleg Bakhmatyuk (collectively, the "Parties").
- 2. The Parties have reached an agreement to resolve all Plaintiffs' claims against Defendants in the above-captioned case.
- 3. Therefore, with all matters having been resolved between Plaintiffs Gramercy Distressed Opportunity Fund II, L.P., Gramercy Distressed Opportunity Fund III, L.P., Gramercy Distressed Opportunity Fund III-A, L.P., Gramercy Funds Management LLC, Gramercy EM Credit Total Return Fund, and Roehampton Partners LLC, and Defendants Nicholas Piazza, SP Capital Management, LLC, Oleksandr Yaremenko, TNA Corporate Solutions, LLC, and Oleg Bakhmatyuk, and in accordance with Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the Parties stipulate and agree to the dismissal, with prejudice, of the Plaintiffs' claims against Defendants in the above-referenced case, with all parties bearing their own attorneys' fees and costs.

DATED 2 October 2024.

W. Gordon Dobie (Pro Hae Vice) WINSTON & STRAWN LLP 35 W. Wacker Drive Chicago, IL 60601-9703 Telephone: (312) 558-5600 Facsimile: (312) 558-5700 wdobie@winston.com ekath@winston.com

Jeanifer E. Parsigian (Pro Hae Vice)
WINSTON & STRAWN LLP
101 California Street
San Francisco, CA 94111
Telephone: (415) 591-1469
Facsimile: (415) 591-1000
iparsigian@winston.com

BY: /s/ Jeffrey Pope

Jeffrey Pope, WY S.B. No. 7-4859 Bryson C. Smith, WY S.B. No. 7-6199 HOLLAND & HART LLP 645 South Cache Street, Suite I00 P.O. Box 68

Jackson, WY 83001-0068 Telephone: (307) 734-9741 Facsimile: (307) 739-9744 jspope@hollandhart.com bcsmith@hollandhart.com

Greg Goldberg HOLLAND & HART LLP 557 17th Street, Suite 3200 Denver, CO 80202 Telephone: (303) 295 - 8099

Facsimile: (303) 668 - 7524 ggoldberg@hollandhart.com

Attorneys for Defendants Nicholas Piazza, SP Capital Management, LLC, Oleksandr Yaremenko, TNA Corporate Solutions, LLC, and Oleg Bakhmatyuk

BY: /s/ Billie LM Addleman
Billie LM Addleman #6-3690
Erin E. Berry, #7-6063
Hirst Applegate, LLP
P. 0. Box 1083 Cheyenne, WY 82003-1083
Phone: (307) 632-0541 Fax: (307) 632-4999
baddleman@hirstapplegate.com
eberry@hirstapplegate.com

Ryan M. Philp (admitted pro hac vice) Alan M. Mendelsohn (admitted pro hac vice) Kristen C. Kuan (admitted pro hac vice) Alston & Bird 90 Park Avenue New York, New York 10016 T. (212) 210-9400